

1 Guido Saveri (22349)
guido@saveri.com
2 R. Alexander Saveri (173102)
rick@saveri.com
3 Geoffrey C. Rushing (126910)
grushing@saveri.com
4 Cadio Zirpoli (179108)
cadio@saveri.com
5 Matthew D. Heaphy (227224)
mheaphy@saveri.com
6 SAVERI & SAVERI, INC.
7 706 Sansome Street
San Francisco, CA 94111
Telephone: (415) 217-6810
8 Facsimile: (415) 217-6813

9 *Lead Counsel for Direct Purchaser Plaintiffs*

10 Mario N. Alioto (56433)
11 Lauren C. Capurro (241151)
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
12 2280 Union Street
San Francisco, CA 94123
13 Telephone: (415) 563-7200
Facsimile: (415) 346-0679
14 E-mail: malioto@tatp.com
laurenrussell@tatp.com
15

16 *Lead Counsel for the Indirect Purchaser Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

22 This Document Relates to:

23 *ALL ACTIONS*

**STIPULATION AND ~~PROPOSED~~ ORDER
RE THIRD AMENDED JURISDICTIONAL
DISCOVERY DEADLINE, BRIEFING
SCHEDULE, AND HEARING DATE**

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) (together with
2 DPPs, “Plaintiffs”), and Defendants Irico Display Devices Co., Ltd. and Irico Group Corporation
3 (together, the “Irico Defendants” or “Irico”), by and through the undersigned counsel, hereby
4 stipulate as follows:

5 WHEREAS, on May 1, 2018, the Court entered a stipulation and order setting a schedule
6 for jurisdictional discovery, motion briefing and a hearing on jurisdictional issues in the DPP
7 Action, ECF No. 5282;

8 WHEREAS, on July 18, 2018 and August 13, 2018, the Court entered orders setting a
9 schedule for jurisdictional discovery in the IPP Action, and motion briefing and a hearing on
10 jurisdictional issues in the IPP Action, and continued the hearing date in the DPP Action, ECF Nos.
11 5317 and 5323;

12 WHEREAS, on October 9, 2018, the Court entered the parties’ stipulation to amend
13 jurisdictional discovery deadline, briefing schedule, and hearing date, ECF No. 5340;

14 WHEREAS, on October 16, 2018, the Court granted DPPs’ motion to compel Irico’s
15 compliance with August 2, 2018 Special Master’s Order granting DPPs’ motion for jurisdictional
16 discovery, ECF No. 5352, as well as IPPs’ motion to compel jurisdictional discovery, ECF No.
17 5353;

18 WHEREAS, on November 5, 2018, the Court entered the parties’ stipulation to amend
19 jurisdictional discovery deadline, briefing schedule, and hearing date, ECF No. 5361;

20 WHEREAS, the parties agree that they need additional time to complete discovery in light
21 of the orders on the motions to compel, including time for the Irico Defendants to comply with
22 those orders in advance of the close of jurisdictional discovery pursuant to those orders, and time to
23 schedule the depositions of certain current and former employees of the Irico Defendants;

24 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between counsel
25 for Plaintiffs and the Irico Defendants:

26 1. The depositions of Mengquan Guo, Zhaojie Wang, and Wenkai Zhang will take
27 place in Hong Kong during the week of March 4, 2019 (i.e., March 4 through March 8);

28 2. Jurisdictional discovery shall close on March 15, 2019;

3. Irico's opening motion(s) regarding jurisdictional issues in the IPP Action shall be due on or before March 1, 2019;

4. DPPs' opposition to Irico's motions in the DPP Action (ECF Nos. 5312, 5313) shall be due on or before March 25, 2019;

5. Irico's reply in support of its motions in the DPP Action shall be due on or before April 25, 2019;

6. IPPs' opposition to Irico's motion(s) in the IPP Action shall be due on or before April 12, 2019;

7. Irico's reply in support of its motion(s) in the IPP Action shall be due on or before May 13, 2019; and

8. The hearing on the motion shall be set for May 30, 2019 at 2 pm, ~~or at some other date and time convenient for the Court.~~

Dated: January 28, 2019

/s/ R. Alexander Saveri

Guido Saveri (22349)
R. Alexander Saveri (173102)
Geoffrey C. Rushing (126910)
Cadio Zirpoli (179108)
Matthew D. Heaphy (227224)
SAVERI & SAVERI, INC.
706 Sansome Street
San Francisco, CA 94111
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

Lead Counsel for Direct Purchaser Plaintiffs

/s/ Mario N. Alioto

Mario N. Alioto (56433)
Lauren C. Capurro (241151)
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: malioto@tatp.com
lauren russell@tatp.com

Lead Counsel for the Indirect Purchaser Plaintiffs

/s/ Stuart C. Plunkett

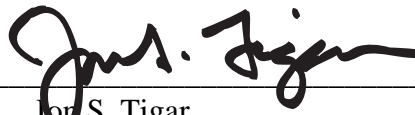
John Taladay (*pro hac vice*)
john.taladay@bakerbotts.com
Erik T. Koons (*pro hac vice*)
erik.koons@bakerbotts.com
BAKER BOTTS LLP
1299 Pennsylvania Ave., NW
Washington, D.C. 20004
Telephone: 202.639.7700
Facsimile: 202.639.7890

Stuart C. Plunkett (State Bar No. 187971)
stuart.plunkett@bakerbotts.com
BAKER BOTTS LLP
101 California Street, Suite 3070
San Francisco, California 94111
Telephone: (415) 291-6200
Facsimile: (415) 291-6300

*Attorneys for Defendants Irico Group Corp.
and Irico Display Devices Co., Ltd.*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3
4 Dated: January 30, 2019

By: 
Jon S. Tigar
United States District Judge